

## Ben Wickert

---

**From:** Ben Wickert  
**Sent:** Monday, February 11, 2019 5:50 PM  
**To:** Christopher Raney  
**Cc:** Andrew Slania  
**Subject:** RE: Taslid

Noted.

Despite Arch's multiple violations of discovery rules (including Rules 34 and 30(b)(6)), as well as its failures to abide by the agreements we established on the deposition record, we will nonetheless make our expert Steve Strzelec available for deposition if you wish to take it. Please let us know. He is located in Sammamish, Washington.

Ben Wickert  
Senior Attorney

BWickert@Raiznerlaw.com  
(d) 713.554.9078  
(f) 713.554.9098

-----Original Message-----

From: Christopher Raney <craney@grsm.com>  
Sent: Monday, February 11, 2019 3:49 PM  
To: Ben Wickert <BWickert@raiznerlaw.com>  
Cc: Andrew Slania <aslania@raiznerlaw.com>  
Subject: Re: Taslid

Cannot agree.

--

Chris Raney | Partner

Gordon & Rees LLP

Direct Dial (713) 490-4823

On 2/11/19, 12:18 PM, "Ben Wickert" <BWickert@raiznerlaw.com> wrote:

Chris, I wanted to follow up on this once more. We would appreciate the courtesy of agreeing to push the submission date of the expert motions until after completion of the expert depositions. Happy to discuss logistics of that. But I need to know your position on this soon, as I am currently facing a deadline of one week from today to respond to all four of your motions. Please feel free to call me at the office. Thanks.

Ben Wickert  
Senior Attorney

BWickert@Raiznerlaw.com

(d) 713.554.9078

(f) 713.554.9098

-----Original Message-----

From: Ben Wickert

Sent: Friday, February 08, 2019 1:02 PM

To: craney@grsm.com

Cc: Andrew Slania <aslania@raiznerlaw.com>

Subject: Taslid

Hi Chris, just wanted to follow up on our call yesterday to see if you would agree to an extension of the responses on the expert motions. Appreciate you letting us know as soon as you can, either way. Thanks very much.

Sent from my iPhone

---

Alabama \* Arizona \* California \* Colorado \* Connecticut \* Florida \* Georgia \* Illinois \* Kentucky \* Louisiana \* Maryland \* Massachusetts \* Missouri \* Nevada \* New Jersey \* New York \* North Carolina \* Ohio \* Oklahoma \* Oregon \* Pennsylvania \* South Carolina \* South Dakota \* Texas \* Utah \* Virginia \* Washington \* Washington, DC \* West Virginia

This email communication may contain CONFIDENTIAL INFORMATION WHICH ALSO MAY BE LEGALLY PRIVILEGED and is intended only for the use of the intended recipients identified above. If you are not the intended recipient of this communication, you are hereby notified that any unauthorized review, use, dissemination, distribution, downloading, or copying of this communication is strictly prohibited. If you are not the intended recipient and have received this communication in error, please immediately notify us by reply email, delete the communication and destroy all copies.

GORDON REES SCULLY MANSUKHANI, LLP  
<http://www.grsm.com>